

DEFICIENCY PROGRESS REPORT – UPDATE 5

November 15, 2007

CUPA: SAN BERNARDINO COUNTY FIRE DEPARTMENT

Evaluation Date: November 8 and 9, 2005

Evaluators: John Paine, Cal/EPA
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Status: Deficiency #1 remains outstanding.

Next Progress Report (6th Update) Due: December 31, 2007

1. **Deficiency:** The CUPA is not meeting the inspection frequencies for the Business Plan, CalARP, UST and Hazardous Waste Generator Programs.

Preliminary Corrective Action by January 30, 2006: The CUPA will develop, submit to Cal/EPA, and implement an action plan that ensures that all regulated businesses in each program are inspected according to the mandated frequencies.

CUPA Corrective Action (July 24, 2006): Action Plan for Inspection Frequency:

- The CUPA will perform quarterly measurement of inspection performance.

Status: We [San Bernardino County CUPA] continue to measure various indicators of inspection performance quarterly and with each individual work performance evaluation.

- The CUPA is scheduled to fill three (3) Hazardous Materials Specialist positions in fiscal year 05-06 approximately in March.

Status: Two positions were filled in March 2006 and [the inspectors] are just being released in July 2006 to begin independent inspections. However, one UST inspector left in the first quarter of 05-06 and one UST CUPA inspector left in the third quarter of 05-06, so the overall number of inspectors remains approximately the same.

- The CUPA is formulating fee increases to cover the cost of four additional Hazardous Materials Specialist positions in 06-07.

Status: Operating fees were increased by 15%, effective July 27, 2006. Also several fee exemptions were eliminated, RMP and tiered Permitting fees were restructured to be per process or unit, and other adjustments were made. This fee increase did allow for four additional positions to be budgeted. Recruitment, identification of qualified candidates, selection, and training for at least three positions are scheduled for the first quarter of 06-07. Also one responder was reassigned leaving a vacancy likely to be filled by an existing inspector in the first quarter of 06-07. A second round of hiring is planned for the third quarter of 06-07 to fill remaining new and vacated positions.

- The CUPA will continue pursuit of risk-based inspection strategy so that the facilities that present the most risk and complexity stay within the 3-year cycle even when we [San Bernardino County CUPA] can't meet the inspection frequency for all sites.

Status: The inspection schedule to begin in September 2006 will use Envision data to identify high priority facilities that have not been inspected within frequency mandates. These include RCRA LQG facilities, CalARP, Tiered Permitting facilities, and some EPCRA facilities and some large employers. A specific task force was identified to provide these listings by September 2006.

- The CUPA will continue to improve capture, coding, and tracking of inspections so the reported data includes all inspections performed.

Status: This is an ongoing process.

- The CUPA will continue to streamline formal enforcement processes so that less inspector time is required for case preparation. The Division is creating a new AEO process scheduled to be in place and initially implemented by 6/30/2006.

Status: The first AEO was resolved in the third quarter of 05-06. Additional work on the streamlined process for CalARP non-filers is scheduled for the first quarter of 06-07.

Cal/EPA Comments to July 24, 2006, Corrective Action: Cal/EPA recognizes the CUPA is making progress towards meeting inspection frequencies for each program element and that San Bernardino County is having staffing issues. Continue implementing the plan of action to meet inspection frequencies. Please provide the inspection frequencies for all of the deficient program elements in the next quarterly report (due Nov. 15th, 2006). This information will be readily available and extractable from the Summary Reports due October 1, 2006.

CUPA Corrective Action (November 27, 2006): Action Plan for Inspection Frequency:

- The CUPA will perform quarterly measurement of inspection performance.

Status: We [San Bernardino County CUPA] continue to measure the various indicators of inspection performance based on our own data parameters for the unit, and with each individual performance evaluation. Additionally, based on the annual Summary Report of 2006, we have set a minimum inspection quota for our inspectors for the 2006-2007 fiscal year. The results of that inspection requirement should be apparent with the summary report of September 2007.

- The CUPA is scheduled to fill three (3) Hazardous Materials Specialist positions in fiscal year 05-06 approximately in March.

Status: In July of 2006, the two inspectors hired in March were released to begin independent inspections. One of those inspectors recently completed training requirements for his REHS, which took him out of the field for three days per week. In October of 2006, one of our experienced inspectors transferred to the UST program, leaving field services one inspector short, but filling an existing vacancy in the UST program. In November 2006, we hired two inspectors who will begin training at the end of the month. Our current plan is to hire an additional two field services inspectors in February or March of 2007. It is anticipated that one current field services inspector will transfer to the emergency response unit at that time.

- The CUPA is formulating fee increases to cover the cost of four additional Hazardous Materials Specialist positions in 06-07.

Status: Done.

- The CUPA will continue pursuit of risk-based inspection strategy so that the facilities that present the most risk and complexity stay within the 3-year cycle even when we [San Bernardino County CUPA] can't meet the inspection frequency for all sites.

Status: Meetings were held in October with each district inspector team to establish their priorities for the rest of the current fiscal year. A data status report is being developed at this time to meet your request for statistical updates. This will be available for the next report.

- The CUPA will continue to streamline formal enforcement processes so that less inspector time is required for case preparation. The Division is creating a new AEO process scheduled to be in place and initially implemented by 6/30/2006.

Status: This continues to be our ongoing process.

Cal/EPA Comments to November 27, 2006, Corrective Action: *The CUPA addresses their need to increase staff members, including fee increases to cover new positions, as stated on the CUPA's January 2006 Action Plan. Based on the CUPA's Annual Inspection Summary Report FY05/06, the CUPA has inspected 28% of its regulated HMRRP businesses, 49% of its regulated CalARP businesses, 73.3% of its regulated UST facilities, and 18% of its regulated HWG facilities. The frequency inspection for the CalARP program has improved tremendously since the previous fiscal year. Great job! However, the frequency of inspections for the HMRRP and HWG programs still fall short of the triennial frequency and also falls below the annual inspections for the UST program.*

Do continue to work toward inspecting at least 33% of the HMRRP, CalARP and HWG businesses, and toward 100% for UST businesses. On the next status report due on February 26, 2007, please update Cal-EPA on the status of this deficiency; for example, include the inspection goals for your inspectors, the actual number of routine inspections conducted and the total number of HMRRP, CalARP, UST, and HWG regulated businesses for the seven months into FY06/07 (July 1, 2006 to January 31, 2007). As stated on the CUPA's 2nd status report, prioritizing the inspections based on the risk and complexity of the facilities is a good strategy; do include the large quantity generators and PBR facilities on your priority.

CUPA Corrective Action (February 26, 2007): The CUPA made a 15% increase on annual operating fees for the 2006-2007 fiscal year. As anticipated, many personnel changes have occurred and a substantial amount of time has been required for training of new inspectors. The following changes have occurred since our November status report:

December

- 1 lead promoted to supervisor of Field Services
- 1 inspector moved from Field Services to UST
- 1 of new inspectors that was hired into Field Services in November left CUPA

January-February (to date)

- 2 UST inspectors retired
- 1 LOP person reassigned to UST
- 1 inspector moved from Field Services to Enforcement
- ER personnel no longer performing routine inspections
- 1 responder from ER transfers into Field Services to be part-time inspector, part-time ER
- 1 HHW specialist transfers into Field Services to be part-time inspector, part-time ER
- 2 new inspectors hired to start in Field Services on 3/05/2007

Other announced vacancies

LOP/UST/AST supervisor retiring at end of February.
1 inspector gives notice of leaving CUPA in April.

Due to the rate of turnover/transfer, of the 13 inspectors currently in the Field Services Unit, 5 are not yet trained for complex inspections, and 3 are not yet cleared for independent inspections. The 2 additional inspectors scheduled to start in March will need to complete 3-6 months of training before being able to conduct independent inspections. All 4 inspectors doing inspections in the UST program (and also covering LOP) are in training for additional UST duties formerly performed by the 2 UST inspectors that retired. Therefore ALL inspectors have a substantial commitment either as trainees or trainers (or both) for the remainder of the fiscal year.

Per your request, the following table summarizes the number of regulated businesses and inspections for the period from 7/1/2006 through 12/31/2006. Please note that the number of businesses active at sometime in the previous 12 months is always greater than the number active as of any one date. Also this data has not gone through the same verification checks that we do annually for summary reporting.

		Inspections from 7/1/2006 to 12/31/2006			
Program	Regulated Businesses (Active sometime in last 12 months)	Routine Inspections	Closure Inspections	Reinspections	Other
HMRRP	6199	790	118	56	14
CalARP	180	13	4	0	0
UST Facilities	871	360	38	27	304
HW Generators	4329	410	98	57	11

Cal/EPA Comments to February 26, 2007, Corrective Action: *Cal/EPA appreciates the effort that San Bernardino County CUPA has done in addressing this deficiency. The CUPA is encouraged to continue to implement the action plan toward correcting this deficiency. On the next status report, due on May 29, 2007, continue to update Cal/EPA on your progress toward correcting this deficiency, including the inspection goals for your inspectors, the actual number of routine inspections conducted and the total number of HMRRP, CalARP, UST, and HWG regulated businesses for the ten months into FY06/07 (July 1, 2006 to April 30, 2007).*

CUPA Corrective Action (May 25, 2007): The following is in response to your [Cal/EPA's] request for a quarterly status report on deficiencies from the November 2005 evaluation of the San Bernardino County CUPA. We continue to follow the September 2006 Self-Audit Action Plan for increasing staffing to improve inspection frequency. The CUPA has proposed a fee increase for annual operating fees for the 2007-2008 fiscal year. Many personnel changes have occurred and a substantial amount of time has been required for training of new or reassigned inspectors. The Division currently has several vacancies to be filled in the fall of 2007.

Per your request, the following table summarizes the current number of regulated businesses and the inspections for the period from 7/01/2006 to 3/31/2007. This data reflects fewer facilities and inspections due to the agricultural field verification project. Additional adjustments are expected when we finish this project at the end of this fiscal year. This data has not gone through the same verification checks that we do annually for summary reporting.

		Inspections from 7/01/2006 to 3/31/2007			
Program	Reg. Businesses currently active (snapshot)	Routine Inspections	Closure Inspections	Re-inspections	Other
HMRRP	5981	977	168	67	23
CalARP	160	19	13	0	0
UST	846	437	51	28	395
Haz Waste Generators	4150	545	139	65	24

Cal/EPA Comments to May 25, 2007, Corrective Action: *The CUPA has increased their inspections for the HMRRP, CalARP, UST, and hazardous waste generator programs since the last update; however, the inspection rates remain below the required inspection frequencies. Therefore, this deficiency remains a correction in progress. The CUPA is encouraged to continue to implement their action plan toward correcting this deficiency. On the next progress report due on August 24, 2007,*

continue to update Cal/EPA on your progress toward correcting this deficiency, including an update of the action plan (e.g., number of positions currently filled and vacancies to be filled, number of inspectors allotted for each program, status of proposed fee increase etc.). Also include the actual number of routine inspections conducted and the total number of HMRRP, CalARP, UST, and HWG regulated businesses for FY 06/07.

CUPA Corrective Action (September 28, 2007): [Information for this update entry is based on the CUPA's FY 06/07 Annual Inspection Summary Reports, FY 06/07 Self-Audit Supplemental Questions and Information, and Self-Audit Action Plan FY 07/08.] The CUPA's FY 06/07 Annual Inspection Summary Report is summarized on the table below.

		Inspections from 7/01/2006 to 6/30/2007	
Program	Regulated Businesses	Routine Inspections	Percentage
HMRRP	6281	1110	17.7%
CalARP	179	17	9.5%
UST	867	603	69.6%
Haz Waste Generators	4389	708	16.1%

The following are items taken from the CUPA's FY 06/07 Self Audit Supplemental Questions and Information:

A. Were there any organizational or resource changes implemented that affected the Unified Program? If yes, describe the changes and their impact.

The following is a list of some of the significant events during the fiscal year that took away from the time required for routine CUPA inspections:

- One field inspector completed REHS training, attending that training 3 days/week at the Environmental Health Services Department from June through December of 2006; Impact: absence of inspector.
- July: One inspector off inspection duties for 4 weeks due to surgery.
- November: 2 new field inspectors begin. One of them leaves in December.
- December: One field services inspector transfers to UST program.
- January: One UST inspector retires; this person was also a night shift Emergency responder.
- February: Lead UST inspector retires; also a member of the Emergency response team.
- February: 2 Field Inspectors become Emergency Response team members; 1 becomes the part-time investigator/part-time

Emergency responder for the Enforcement unit and the other remains a daytime field service inspector, requiring a minimum of 8 weeks of initial training for emergency response.

- One full-time day shift Emergency Response position was vacant for 12 months of the evaluation period. This significantly increased the frequency of the Enforcement Program Investigator's ER responses, reducing the time spent preparing and reviewing formal enforcement cases.
- February: One Household Hazardous Waste Staff member and one fulltime day emergency responder transfer to field services, requiring 4-6 weeks of training in field inspections. Both employees remain after-hours emergency responders.
- February: The Supervisor of LOP/UST/AST retires.
- April: New field inspector begins; requires training.
- April: One Field inspector resigns.
- May: UST/LOP Supervisor position filled from existing Field Services lead.

During FY 06/07 we [San Bernardino County CUPA] experienced significant and frequent shifts in personnel, assignments, and duties due to turnover, reorganization, and projects. The CUPA continued to transition all professional staff to having inspection duties and continued to cross-train inspectors in an attempt [to] increase their confidence with all activities and all program elements.

B. What was the total number of staff and Supervisors, FTEs, assigned to perform Unified activities during the reporting year?

As we [San Bernardino County CUPA] stated last year, this number is difficult to communicate accurately due to turnover and the multi-tasking nature of the Division. We [San Bernardino County CUPA] have hired and lost many people. Several people share CUPA and non-CUPA jobs. For example, until February of 2007, when ER staff was not in the field responding to emergencies, they performed inspections. Since February of 2007 they no longer perform inspections unless the emergency response is at a facility. Our Enforcement Investigator is also a daytime ER back up, and no longer an inspector. LOP personnel (3) have obtained ICC Certification to help cover UST inspections when the 2 UST inspectors are absent, in training or otherwise completely booked. However, a rough estimate would be **27.8 FTEs** including administrative, managerial, and technical staff. See organization chart [provided as attachment].

- **What number of the total FTE were supervisory or managerial positions? 2.2** (1/2 Manager, proportionate FTE actual Supervisors, and leads acting as Supervisor)

- **What number of the total FTE were support/administrative positions? 9.4** (6 Clerical, 1 File Room, 2 MIS, 2 equiv non-field CUPA program leads)
- **What number of total FTE was assigned Unified Inspection duties? 16.2**
 - a. **HMRRP:** All inspectors perform handler inspections, but that effort is approximately 8.0 FTE as percent of total.
 - b. **UST:** This year, the UST program experienced extreme turnover. 7 different individuals had part-time UST assignments that totaled 2.0 FTE. This does not include district inspectors not specifically assigned to UST who do paperwork-only verifications at complex sites.
 - c. **HWG:** 13 staff do generator inspections regularly, but approximately 5 FTE as percent of total.
 - d. **CalARP:** 13 are now expected to do CalARP inspections, but during this FY, approx 1.0 FTE: For this last fiscal year, this included a significant portion of 1 specialist and small fragments of all the other district inspectors.
 - e. **TP:** Senior inspectors are expected to do TP inspections but during this FY, approximately 2 FTE as percent of total. It will remain a small fraction due to the limited numbers of these facilities.

This CUPA has worked to improve data capture to make sure that we [San Bernardino County CUPA] can claim and document the work that we do. However, it is clear that the basic numbers of field inspectors that we [San Bernardino County CUPA] have are just not sufficient for the size of the jurisdiction, the growth and turnover rate, and the time it takes to get someone qualified to do CUPA inspections to the quality expected. Also, while our overall number of regulated facilities has increased, inspectors and management have reasons to believe that the number of facilities that should be regulated is increasing at a faster rate than the CUPA staff can accurately identify. While we [San Bernardino County CUPA] have many options for identifying these new facilities, all options require staff time and these new business identification activities compete for the staff time to serve the existing fee-paying regulated facilities.

Also, growth in the County, especially in distribution facilities related to an expanding transportation industry, is accompanied by increases in traffic and congestion, making traveling across the valley and up into the desert in this 20,000 square mile County an even larger percentage of our field time. We [San Bernardino County CUPA] expect the growth to continue and we anticipate more vacancies in senior specialty positions in the next 3 years in the Division. CUPA inspectors are typically the group from which these specialists are selected. So the primary supervisory and lead effort

for the next year is to continue to focus field staff on achieving a balance of high priority inspections and a minimum number of inspections. The primary management effort is to establish a 3-year staffing and revenue plan to be better prepared for staff fluctuations and better serve the facilities that require regulation under CUPA.

For FY 06-07 each district developed a specific plan of attack for achieving a balance of high priority inspections and overall routine inspections. Some plans included the exploration of field offices, a direct to field/direct home option to save on travel time, and other mechanisms to increase the time available for field inspections.

The following are excerpts taken from the CUPA's FY 07/08 Self Audit Action Plan.

Inspection Action Plan - FY 07/08:

- Hire 4 inspectors, depending [on] resources for current vacancies, and backfill resulting vacancies.
- Continue developing a streamlined enforcement process based on Administrative Enforcement Orders. Increase the number of the AEOs generated by this Department for all units.
- Develop and implement a plan to focus on high priority inspections. Temporarily change specialties to program implementation short-term projects including prioritization of high-risk facility inspection and development of a local recruitment program,
- Integrate the training of UST inspectors with generator/handler inspectors to streamline the inspection process and mutually assist each unit when possible.
- Hire Public Service Employees to find new facilities that are currently not under permit. Establish a facility self-certification for bulk CO2 handlers.

UST Action Plan - FY 07/08:

- Train additional inspection staff to take ICC Certified UST Inspector's exam.
- Continue cooperation with other CUPA programs to address Hazardous Waste UST issues.
- Fill the vacant UST Inspector position.
- Continue to evaluate third party web based UST construction, monitoring and inventory information management system (Unidocs) for applicability and compatibility with the department's current electronic data management system (Envisions for Windows).
- Once fully staffed, increase inspection frequency to assure all UST facilities are inspected within the specified time frames.

AST Action Plan - FY 07/08:

- Train additional inspection staff regarding Uniform Fire Code, Health and Safety Code and California Code of Regulations requirements pertaining to AST construction and operating compliance.
- Expand inspection program to conduct routine annual compliance inspections of all regulated AST systems.
- Evaluate third party web based AST construction, monitoring and inventory information management system (Unidocs) for applicability and compatibility with the department's current electronic data management system (Envisions for Windows).

Enforcement Action Plan – FY 07/08:

- The new Investigator will have completed the majority of training required for part-time “back-up” to the ER Program and will devote additional time to investigative training and preparing, reviewing and submitting formal enforcement cases.
- A request for an additional full-time Investigation and Enforcement Program position will be submitted as a budget request for hiring during FY 07/08.
- Standard AEO forms and procedures will be prepared to utilize for pursuing formal enforcement actions for the Hazardous Materials, Hazardous Waste and UST Program Elements.

Cal/EPA, SWRCB, & DTSC Comments to September 28, 2007,

Corrective Action: *Cal/EPA, SWRCB, and DTSC acknowledge the difficulties that the CUPA is undertaking with the high staff turnover rate. We also appreciate the efforts that the CUPA has made in addressing this deficiency. However, this deficiency remains a correction in progress. The CUPA is encouraged to continue to implement and amend, as necessary, their FY 07/08 action plan, keeping in mind the CUPA's primary management goal of “establish[ing] a 3-year staffing and revenue plan to be better prepared for staff fluctuations and better serve the facilities that require regulation under CUPA.”*

In line with the CUPA's goal in “achieving a balance of high priority inspections and a minimum number of inspections,” the CUPA is also strongly encouraged to continue to prioritize on inspecting tiered permitting (TP) facilities and, in addition, to prioritize inspections on large quantity generators (LQG). On the next progress report due on December 31, 2007, continue to update Cal/EPA on your progress toward correcting this deficiency, including an update of the action plan (e.g., staff information for each program). Include the actual number of routine (compliance) inspections conducted and the total number of HMRRP, CalARP, and UST regulated facilities for the first five months into FY 07/08 (July 1, 2007, to November 30, 2007). Also, include the total number of

TP, LQG and "other" hazardous waste generator facilities and the actual number of routine (compliance) inspections conducted for each of these categories of generators during first five months into FY 07/08.

2. **Deficiency:** The CUPA is not fully regulating the agricultural handlers (farms) who are subject to the Business Plan Program.

Preliminary Corrective Action by January 30, 2006: The CUPA will develop, submit to Cal/EPA, and implement an action plan to ensure that all agricultural handlers are regulated, including annual submission of inventory information and performance of compliance inspections.

CUPA Corrective Action (July 24, 2006): Action Plan for Agricultural Handlers: Once the additional 05-06 staff are hired and have completed the initial training that allows them to do unaccompanied field activity (probably not until fiscal year 06-07), the CUPA will assign a project team to perform specified tasks to identify agricultural facilities requiring permits and incorporate into guidance documents and inspection plans.

Status: Additional 05-06 staff began unaccompanied field activity in July of 2006. At the June field staff meeting a task force was charged with initiating the review of agricultural facilities.

Cal/EPA & OES Comments to July 24, 2006, Corrective Action:
Cal/EPA is satisfied with the progress San Bernardino County is making to ensure that all agricultural handlers are fully regulated. Please provide us an update on this progress in the next quarterly report (due Nov. 15th, 2006).

CUPA Corrective Action (November 27, 2006): The agricultural handler task team has identified over 450 facilities. We believe that a great majority of them are no longer operating. In the meantime, they have contacted the Ag[ricultural] Commissioner, the Dairy Council and several cities in an effort to identify those facilities that no longer exist due to development. Additionally, Envision forms have been generated to assist all field staff in expediting this project, and it is anticipated that the remaining sites can be inspected by the end of the three-year evaluation period.

Cal/EPA Comments to November 27, 2006, Corrective Action:
Cal/EPA considers this deficiency a correction in progress. The CUPA is in the process of identifying the number of active agricultural facilities (450 facilities, more or less). On the next status report due on February 26, 2007, please update Cal/EPA on the status of this deficiency by submitting the total (gross) number of agricultural handlers within the county, the

number of exempt agricultural handlers, the total number of agricultural handlers (excluding the exempt facilities) that have been inspected within the first seven months into FY06/07 (July 1, 2006 to January 31, 2007) and the CUPA's goal to inspect the remaining number of regulated agricultural handlers.

CUPA Corrective Action (February 26, 2007): We have informed OES personnel of the status of this situation and plan to complete the majority of this project during the annual April and May staff inspection challenge. The status of these facilities will be determined at that time. Agricultural facilities have previously been fee exempt and were not sent routine correspondence (e.g. invoices) so we do not get returned mail or other indicators that a business is out of business. There also has been an inordinate amount of residential and commercial development in the agricultural areas of San Bernardino County. So we have several reasons to believe that the number of generators, handlers, and USTs at agricultural facilities is less than indicated in our permit system. To address the agricultural facilities in a consistent manner, inspections have been limited to those driven by specific concerns. The total number of agricultural facilities inspected July 1, 2006 – December 31, 2006, is 6 on 8 different dates, with 2 of those being routine inspections. The CUPA's goal is to inspect all **known** agricultural facilities to verify their existence and to determine their permit and compliance status and to complete the field work on those inspections by the end of May. Accounting for finalization of inspection reports, return to compliance timeframes, and updating of automated information, a final number of confirmed agricultural facilities should be available in July.

Cal/EPA & OES Comments to February 26, 2007, Corrective Action: *Cal/EPA & OES appreciate the effort that San Bernardino County CUPA has achieved toward correcting this deficiency. Cal/EPA considers this deficiency corrected and no further update is required.*

3. **Deficiency:** The CUPA has not consistently published an initial public notice to initiate the process for government and public review of Risk Management Plans. The CUPA published initial notices for all Fed. RMPs but not for all the Ca. only RMPs.

Preliminary Corrective Action (due date unspecified): For each RMP submitted, the CUPA will publish all initial public notices in a local newspaper of general circulation stating that an RMP has been submitted and the AA has initiated the process for government and public review.

CUPA Corrective Action (July 24, 2006): Action Plan for Initial Public Notices of RMPs: Modified procedure. **Status:** The procedure has

been changed and the first new or modified RMP filed since the November evaluation was filed on June 9, 2006, and the initial public notice was sent for publication on June 21, 2006, and was published on July 19, 2006. The minor delay was due to the need to make initial publication arrangements with a different paper.

Cal/EPA Comments to July 24, 2006, Corrective Action: *Cal/EPA considers this deficiency corrected. However, please attach a copy of the modified procedures for the public notice of RMPs to the next QR [quarterly report].*

CUPA Corrective Action (November 27, 2006): Corrected; modified procedures enclosed as requested.

Cal/EPA Comments to November 27, 2006, Corrective Action: *Thank you for submitting the CUPA's modified CalARP Submission Process. Deficiency 3 is considered corrected and no further update is required.*